

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
JAMES S. BERNAT,)	
)	
Plaintiff,)	
v.)	C.A. NO: 04-0058-NMG
)	
GENTEX OPTICS, INC.)	
)	
Defendant.)	
_____)	

DEFENDANT, GENTEX OPTICS, INC.'S, FED.R.CIV.P. 26(a)(1)
INITIAL DISCLOSURE

Defendant, Gentex Optics, Inc. ("Gentex"), hereby provides the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Gentex relies on currently available information and reserves the right to identify additional persons, documents and tangible things.

A. Individuals Likely to Have Discoverable Information Relevant to Disputed Facts and Subjects of Information.

Individuals who may have knowledge of issues disputed in the pleadings:

1. James S. Bernat

Mr. Bernat is likely to have discoverable information on all issues raised in the Complaint and Answer.

2. Brett Foley

Mr. Foley is likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's conduct, reasons for Mr. Bernat's termination, and statements made regarding Mr. Bernat.

3. Dennis Goding

Mr. Goding is likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's conduct.

4. Jeffrey Lloyd

Mr. Lloyd is likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's conduct.

5. Amy Powers

Ms. Powers is likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's conduct.

6. Ian Webster

Mr. Webster is likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's conduct, reasons for Mr. Bernat's termination, and statements made regarding Mr. Bernat.

7. Shannon Spitz

Ms. Spitz is likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's request for medical leave.

8. Representative(s) from Gentex

Other representative(s) and/or employee(s) from Gentex are likely to have discoverable information on subjects including, but not limited to, Mr. Bernat's request for medical leave, Mr. Bernat's work history, Mr. Bernat's conduct, Mr. Bernat's salary information.

Gentex recognizes that persons other than those listed may have knowledge of discoverable information, and reserve the right to supplement this disclosure during the course of discovery.

B. Description and Location of Documents, Data Compilations and Tangible Things Relevant to Disputed Facts.

1. Mr. Bernat's personnel file; Office of Perkins, Smith & Cohen, LLP.
2. Mr. Bernat's training file; Office of Perkins, Smith & Cohen, LLP.
3. Documents concerning Mr. Bernat's medical history; Office of Perkins, Smith & Cohen, LLP.

C. Computation of Damages.

N/A

D. Insurance Agreements.

None

Dated: August 2, 2004.

Defendant , Gentex Optics, Inc.
By its attorneys,

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